

FILED

APR 17 2015

SECRETARY, BOARD OF
OIL, GAS & MINING

**BEFORE THE BOARD OF OIL, GAS AND MINING
DEPARTMENT OF NATURAL RESOURCES
STATE OF UTAH**

IN THE MATTER OF THE REQUEST FOR AGENCY ACTION OF EP ENERGY E&P COMPANY, L.P. FOR AN ORDER POOLING ALL INTEREST, INCLUDING THE COMPULSORY POOLING OF THE INTERESTS OF ARGO ENERGY PARTNERS, LTD., DUSTY SANDERSON, HUNT OIL COMPANY, KKREP, LLC, AND J.P. FURLONG CO., IN THE DRILLING UNIT ESTABLISHED FOR THE PRODUCTION OF OIL, GAS AND ASSOCIATED HYDROCARBONS FROM THE LOWER GREEN RIVER-WASATCH FORMATIONS COMPRISED OF ALL OF SECTION 2, TOWNSHIP 3 SOUTH, RANGE 5 WEST, U.S.M., DUCHESNE COUNTY, UTAH

**MOTION FOR CONSIDERATION
OUT OF TIME**

Docket No. 2015-013

Cause No. 139-130

COMES NOW, J.P. Furlong Co., ("Respondent") acting by and through their attorney, Anthony T. Hunter, pursuant to Utah Admin. Code Rule R641-105-300 and R641-100-300, and hereby moves the Utah Board of Oil Gas and Mining (the "Board") to consider Respondent's Reply to Second Memorandum. In support of its motion, Respondent states as follows:

1. Fully briefing the issues of law on paper will minimize the need to raise and argue fine points of law at the Board hearing for preservation of issues on appeal to the Utah Supreme Court; and
2. Focusing on issues of fact at the hearing will maximize the efficiency of the parties' limited time before the Board.

WHEREFORE, Respondent respectfully requests that the Board:

- a. ALLOW the attached Reply to Second Memorandum to be made part of the record of decision; and
- b. CONSIDER its merits when making its decision on the Cause.

c. Provide other such relief as appears just and reasonable.

A handwritten signature in blue ink, appearing to read 'A. Hunter', written over a horizontal line.

By: _____

Anthony T. Hunter #11675

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**ORDER FOR CONSIDERATION
OUT OF TIME**

Docket No. 2015-013
Cause No. 139-130

Having reviewed J.P. Furlong Co.'s Motion for Consideration Out of Time, the record of the captioned cause, and otherwise being fully advised on the premises,

1. J.P. Furlong Co.'s Motion for Consideration Out of Time is hereby GRANTED; and
2. The filing dated April 17, 2015 entitled "Reply to Second Memorandum" shall be made part of the record of decision in the captioned cause and considered during resolution of captioned matter.

SO ORDERED, this _____ day of April, 2015.

Prepared by:
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Attorney for J.P. Furlong Co.

Ruland J. Gill, Jr., Chairman

CERTIFICATE OF MAILING

I certify that I caused a true and correct copy of the foregoing document to be mailed via U.S. Postal Service and via electronic mail to the below named parties.

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Signed, this 17th day of April, 2015.


